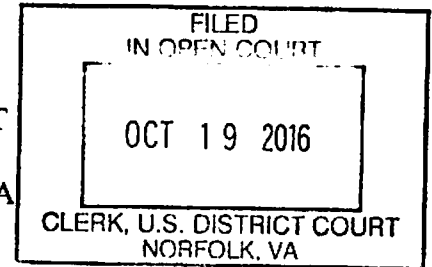


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

NORFOLK DIVISION



UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 2:16cr 139
v.)	
)	18 U.S.C. § 1343
LINDSAY KNEFF,)	Wire Fraud
)	(Counts 1-6)
Defendant.)	
)	18 U.S.C. § 1341
)	Mail Fraud
)	(Counts 7-12)
)	
)	18 U.S.C. § 500
)	False Alteration of Postal Service
)	Money Orders
)	(Count 13)
)	
)	18 U.S.C. § 1957
)	Engaging in Monetary Transactions in
)	Criminally Derived Property
)	(Counts 14-16)
)	
)	Forfeiture

INDICTMENT

OCTOBER 2016 TERM – at Norfolk, Virginia

COUNTS ONE THROUGH SIX

THE GRAND JURY CHARGES THAT:

During the period from in or about January 2014 through August 2015, in the Eastern District of Virginia, LINDSAY KNEFF, the defendant, did devise and intend to devise a scheme and artifice to defraud Rose & Womble Realty Company (Rose & Womble) and for obtaining money and property from Rose & Womble by means of materially false and fraudulent

pretenses, representations and promises, which scheme and artifice, and the execution thereof, were in substance as follows:

1. At all material times, Rose & Womble was a realty company with offices located in the Hampton Roads area of Virginia, including an office in Virginia Beach, Virginia. LINDSAY KNEFF, the defendant, was employed by Rose & Womble in a managerial position in its Virginia Beach office and was responsible for overseeing the processing of commissions, accounts payable and other miscellaneous duties.

2. The object of the defendant's fraudulent scheme and artifice was to embezzle, steal and convert to her own use monies belonging to Rose & Womble.

3. It was a part of the scheme and artifice that the defendant, without authority, wrote checks on the Rose & Womble operating account to pay for her personal expenses, including electricity and utility bills.

4. It was a further part of the scheme and artifice that the defendant made unauthorized wire transfers of funds from Rose & Womble's operating account into her own bank accounts.

5. It was a further part of the scheme and artifice that the defendant stole approximately 284 money orders that were made payable to Rose & Womble. She subsequently altered the payee information by writing in her own name. The defendant negotiated said money orders and used the proceeds for her own personal benefit.

6. It was a further part of the scheme and artifice that the defendant concealed and attempted to conceal her embezzlement of funds belonging to Rose & Womble by creating fictitious vendors in the accounting software of the company to make it appear that said vendors had received wire transfers of funds from Rose & Womble, when in fact the defendant had made unauthorized wire transfers of said funds to her own bank accounts.

7. As a result of said scheme and artifice, the defendant fraudulently obtained approximately \$255,147.20 from Rose & Womble to which she was not entitled and used for her own benefit.

8. On or about the dates set forth below, in the Eastern District of Virginia, for the purpose of executing the aforesaid scheme and artifice, LINDSAY KNEFF did cause to be transmitted by means of wire communication in interstate commerce, certain signs, signals, pictures and sounds as set forth below, each wire transmission being a separate count of this indictment as indicated:

COUNT	DATE OF WIRE	DESCRIPTION
1	02/18/2015	Transfer of funds in the amount of \$1,895 from Rose & Womble Operating Acct to NFCU Account in Defendant's name.
2	07/07/2015	Transfer of funds in the amount of \$10,233.25 from Rose & Womble Operating Acct to NFCU Account in Defendant's name.
3	07/23/2015	Transfer of funds in the amount of \$10,000 from Rose & Womble Operating Acct to NFCU Account in Defendant's name.
4	08/04/2015	Transfer of funds in the amount of \$10,500 from Rose & Womble Operating Acct to NFCU Account in Defendant's name.
5	08/11/2015	Transfer of funds in the amount of \$8,500 from Rose & Womble Operating Acct to NFCU Account in Defendant's name.
6	08/18/2015	Transfer of funds in the amount of \$10,200 from Rose & Womble Operating Acct to NFCU Account in Defendant's name.

(In violation of Title 18, United States Code, Section 1343.)

COUNTS SEVEN THROUGH TWELVE**THE GRAND JURY FURTHER CHARGES THAT:**

1. The introductory paragraph and Paragraph 1-7 of Counts One through Six of this indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates set forth below, in the Eastern District of Virginia, for the purpose of executing the aforesaid scheme and artifice and attempting so to do, LINDSAY KNEFF did place and cause to be placed in a post office or authorized depository for mail matter, to be sent and delivered by the Postal Service, and did knowingly cause to be delivered by mail according to the direction thereon, the following matters and things, each mailing being a separate count of this indictment as indicated:

COUNT	DATE OF MAILING	DESCRIPTION
7	03/21/2014	Rose & Womble Check #215923 in the amount of \$306.67 made payable to City of Virginia Beach.
8	07/29/2014	Rose & Womble Check #219778 in the amount of \$315.80 made payable to City of Virginia Beach.
9	12/09/2014	Rose & Womble Check #222063 in the amount of \$68.75 made payable to HRSD.
10	04/22/2015	Rose & Womble Check #224136 in the amount of \$75.80 made payable to HRSD.
11	04/22/2015	Rose & Womble Check #224135 in the amount of \$297.21 made payable to Dominion Virginia Power.
12	08/18/2015	Rose & Womble Check #226467 in the amount of \$250.50 made payable to Dominion Virginia Power.

(In violation of Title 18, United States Code, Section 1341.)

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

During the period from in or about November 2014 through August 2015, in the Eastern District of Virginia, LINDSAY KNEFF, the defendant, with intent to defraud, did falsely alter, in a material respect, twenty-eight (28) money orders provided and issued by and under the direction of the Postal Service and payable in the United States, in that the defendant altered the payee information by writing in her own name. The defendant negotiated said money orders and used the proceeds for her own personal benefit.

(In violation of Title 18, United States Code, Section 500.)

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 7, 2015, in the Eastern District of Virginia, LINDSAY KNEFF, the defendant, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000.00 and which was derived from specified unlawful activity, namely, wire fraud in violation of Title 18, United States Code, Section 1343, that is, the wire transfer of \$11,000.00 from a Navy Federal Credit Union account controlled by the defendant to a First Community Bank account in the name of other persons.

(In violation of Title 18, United States Code, Section 1957.)

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 8, 2015, in the Eastern District of Virginia, LINDSAY KNEFF, the defendant, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000.00 and which was derived from specified

unlawful activity, namely, wire fraud in violation of Title 18, United States Code, Section 1343, that is, the wire transfer of \$11,157.50 from a Rose & Womble account at Heritage Bank to an account at Navy Federal Credit Union controlled by the defendant.

(In violation of Title 18, United States Code, Section 1957.)

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 7, 2015, in the Eastern District of Virginia, LINDSAY KNEFF, the defendant, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000.00 and which was derived from specified unlawful activity, namely, wire fraud in violation of Title 18, United States Code, Section 1343, that is, the wire transfer of \$15,000.00 from a Rose & Womble account at Heritage Bank to an account at Navy Federal Credit Union controlled by the defendant.

(In violation of Title 18, United States Code, Section 1957.)

FORFEITURE

The defendant, LINDSAY KNEFF, if convicted of any of the violations alleged in Counts 1-13 of this indictment, shall, as part of the sentencing of the defendant pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.

The defendant, LINDSAY KNEFF, if convicted of any of the violations alleged in Counts 14-16 of this indictment, shall, as part of the sentencing of the defendant pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, forfeit to the United States any property, real or personal, involved in the violation, or any property traceable to that property.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), the defendant shall forfeit substitute property, up to the value of the property subject to forfeiture as described above, if, as a result of any act or omission of the defendant, any such property subject to forfeiture cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

The property subject to forfeiture includes, but is not limited to, the following property:

1. A sum of money of at least \$255,147.20, which is the total amount of gross proceeds of the offenses charged in Counts 1-13. Said sum of money is subject to a monetary judgment in favor of the United States.

2. 2015 Volkswagen Jetta, Vehicle Identification No. 3VWD07AJ0FM214622.

3. The contents of Navy Federal Credit Union account #7041714614 in the name of Lindsay Marie Kneff.

4. The contents of Navy Federal Credit Union account #3041303086 in the name of Lindsay Marie Kneff.

(In accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1).)

United States v. Lindsay Kneff

Criminal No. 2:16cr 139

A TRUE BILL:

Redacted

FOREPERSON

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